UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

SOUTH CAROLINA COASTAL CONSERVATION LEAGUE; et al.,

Plaintiffs

and

STATES OF MARYLAND, et al.

Intervenor-Plaintiffs,

v.

WILBUR ROSS, in his official capacity as the Secretary of Commerce; et al.,

Defendants

and

INTERNATIONAL ASSOCIATION OF GEOPHYSICAL CONTRACTORS, et al.

Intervenor-Defendants.

CITY OF BEAUFORT; et al.,

Plaintiffs,

v.

NATIONAL MARINE FISHERIES SERVICE; et al.,

Defendants.

Civil Action No. 2:18-cv-03326-RMG (Consolidated with 2:18-cv-3327-RMG)

INTERVENOR-DEFENDANTS'
NOTICE OF JOINDER IN FEDERAL
DEFENDANTS' REPLY IN
SUPPORT OF PARTIAL MOTION
TO DISMISS PLAINTIFFINTERVENOR SOUTH
CAROLINA'S COMPLAINT-ININTERVENTION

Intervenor-Defendants International Association of Geophysical Contractors, CGG

Services (U.S.) Inc., GX Technology Corporation, Spectrum Geo Inc., TGS-NOPEC

Geophysical Company, WesternGeco LLC, and American Petroleum Institute respectfully join and support the Federal Defendants' Reply in support of their Partial Motion to Dismiss Plaintiff-Intervenor South Carolina's Complaint-in-Intervention, Dkt. 290. For the reasons set forth in the Federal Defendants' motion to dismiss and reply, Claims 1, 6, 7 and 8 of South Carolina's Complaint-in-Intervention should be dismissed.

DATED: May 17, 2019 Respectfully submitted,

s/ Sean D. Houseal

Richard Morton, Fed. Id. No. 5442 Sean Houseal, Fed. Id. No. 7676 WOMBLE BOND DICKINSON (US) LLP 301 S. College Street, Suite 3500 Charlotte, NC 28202-6037 5 Exchange Street Charleston, SC 29401 Telephone: 704-331-4993

843-720-4622

Facsimile: 843-723-7398

Email: <u>Ric.Morton@wbd-us.com</u> Email: <u>Sean.Houseal@wbd-us.com</u>

Ryan P. Steen, Admitted *Pro Hac Vice*Jason T. Morgan, Admitted *Pro Hac Vice*STOEL RIVES LLP
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206-624-0900

Facsimile: 206-386-7500
Email: ryan.steen@stoel.com
jason.morgan@stoel.com

Counsel for Intervenor-Defendants